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## Attorneys for Debtor and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES DIVISION**

In re:

CRESTLLOYD, LLC,

## Debtors and Debtors in Possession.

Case No.: 2:21-bk-18205-DS

## Chapter 11 Case

**MOTION TO DENY “SECOND INTERIM APPLICATION OF SMITH, ANDRE MARIO EL SUI JURIS; ESQUIRE FOR APPROVAL OF FEES AND REIMBURSEMENT AT EXPENSES”**

## Hearing

Date: December 17, 2024

Time: 1:00 p.m.

Place: Courtroom 1639

255 E. Temple Street  
Los Angeles, CA 90012  
**VIA ZOOMGOV ONLY**

1       Crestlloyd LLC, the debtor and debtor in possession in the above-captioned chapter 11  
2 case (the “Debtor”), hereby files its motion to that certain “SECOND INTERIM APPLICATION  
3 OF SMITH, ANDRE MARIO EL SUI JURIS; ESQUIRE FOR APPROVAL OF FEES AND  
4 REIMBURSEMENT AT EXPENSES” (the “Application”) filed by Andre Mario Smith  
5 (“Applicant”).

6       On December 3, 2024, counsel for the Debtor received in the mail the Application, a copy  
7 of which is attached hereto as **Exhibit “A”**. The Application was inserted into an envelope  
8 marked “top secret”, “urgent”, “private” and “confidential”. The Debtor has no record of the  
9 Application having been filed with the Clerk of the Bankruptcy Court. Nevertheless, in an  
10 overabundance of caution, Debtor files this Motion.

11      The alleged Applicant is not a professional employed by the Debtor and, based on a  
12 review of the Court’s docket, not one that was approved to be employed by the Bankruptcy Court  
13 as a professional in this case. As a result, there is no basis for consideration of the Application.

14      A review of the Application and the records attached thereto make it clear that Applicant  
15 took an old application submitted by Levene, Neale, Bender, Yoo & Golubchik L.L.P., doctored  
16 the text and entries in LNYG’s format. There is no indication that Applicant’s services were  
17 requested, necessary or benefited the estate in any way.

18      To the extent considered at all, the Application should be denied in its entirety with an  
19 admonition to Applicant, based on the instant filing and many prior filing, not to engage in  
20 improper conduct in connection with this case in the future.

21 Dated: December 4, 2022

LEVENE, NEALE, BENDER, YOO  
& GOLUBCHIK L.L.P.

23 By: /s/ David B. Golubchik  
24 DAVID B. GOLUBCHIK  
TODD M. ARNOLD  
25 Attorneys for Chapter 11 Debtor and  
Debtor in Possession

**EXHIBIT A**

1    *Smith, Andre Mario el sui-juris; esquire*  
2    7938 Broadway No. 1263  
3    Lemon Grove, California, 91946  
4    (619) 813-2881  
5    Fax Number: N/A  
6    andmarioith@yahoo.com  
7    Attorney in-Fact; Lawful Counselor for:  
8    *Special Interested Party*  
9    Andre Mario Smith.  
10   **Special Appearance Only**  
11   Andre Mario Smith, Pro Se



**UNITED STATES DISTRICT COURT AT AND FOR  
CALIFORNIA SOUTHERN DISTRICT  
LOS ANGELES**

22 *Greetings to all these Presents shall come.*

23 *Know all men by these Presents.*

24 *Notice to Agent is Notice to Principal.*

25 *Notice to Principal is Notice to Agent.*

26 *To each Party and their Attorney(s) of Rec.*

27 *To Each Party and their Counsel.*

1 It appears *Smith, Andre Mario et sui juris; esquire* ("Counselor"), general bankruptcy  
2 counsel to Special Interested Party, Secured Party, Secured Party Creditor, and  
3 Superior Supreme Creditor Andre Mario Smith ("Paramount Claim Holder") in the above-  
4 referenced Chapter 11 bankruptcy, hereby submits its Second Interim Application for  
5 Approval of Fees and Reimbursement of Expenses ("Application") for services rendered and  
6 expenses incurred during the pendency of the CRESTLI OYD, LLCs' ("Debtor") chapter 11  
7 bankruptcy case for the period of January 01, 2022 through and including December 31,  
8 2022 ("Covered Period").

9 I.

10 Fees and Expenses Incurred and Notice

11 A. Request for Allowance and Payment of Fees and Reimbursement of Expenses.

12 During the Covered Period, it appears Counselor incurred fees in the amount of  
13 \$2,720,000.99 and expenses in the amount of \$15,270.99 for total fees and expenses  
14 \$2,735,271.98. Accordingly, it appears Counselor is owed a balance of \$2,735,271.99 for  
15 fees and expenses incurred during the covered period. It appears Counselor respectfully  
16 submits that its' requested fees and expenses are reasonable and should be approved on an  
17 interim basis. Accordingly, pursuant to the Application, it appears Counselor is seeking  
18 authority for the Debtors' estate to remit payment/pay Counselor the unpaid balance at  
19 \$2,735,271.98 for fees and expenses incurred during the Covered Period.

20 B. Proper Notice.

21 Pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(6) and any/all applicable  
22 Local Bankruptcy Rules, it appears Counselor served notice of this Application and the  
23 amount of fees and expenses sought herein upon the Debtor, the Office of The United States  
24 Trustee ("OTUST"), all creditors, and all parties who have requested special notice.

25 //

26 //

27 //

28 //

II.

Brief Narrative History at the Present Posture at the Debtors' Chapter 11 Case, Adversarial Proceedings, Circumstances That Led to Paramount Claim Holders Claim, and Significant Events Which Occurred During the Covered Period.

## A. Background

9 It appears on or about October 26, 2021 ("Action Date"), the Debtor allegedly  
10 commenced its bankruptcy action by allegedly filing a voluntary petition under Chapter 11  
11 of the Bankruptcy Code. It appears the Debtor is allegedly operating its estate and managing  
12 its financial affairs as a Debtor in Possession pursuant to Section 1107 and 1108 of the  
13 Bankruptcy Code.

14 On the Action Date, it appears the Debtor's primary asset was ancient burial land  
15 mistaken, perhaps, by Debtor for a piece of residential real property that it allegedly  
16 "developed" located at 944 Airole Way, Los Angeles, California 90077 (the "Lands").  
17 Fortunately, it appears before the mistaken Lands could be completed and sold the likes  
18 and/or otherwise, the Debtor's alleged primary secured lender, Hankey Capital, LLC  
19 ("Hankey"), as well as a number of other alleged junior secured lenders and alleged  
20 mechanic's lien holders ("Mechanic's Lien Holders"), allegedly initiated a multitude of state  
21 court actions against Debtor allegedly seeking, among other things, to recover amounts  
22 allegedly owed and to allegedly foreclose on the Lands. In connection with its action, it  
23 appears Hankey allegedly sought and obtained the appointment of a receiver ("Receiver")  
24 for the Lands.

25 It appears, in an effort to protect its, hereby declared, illusory equity in the Lands, to  
26 address the litany of illusory litigation and claims against it, and to allegedly regain illusory  
27 possession and control over the Lands and enjoy the benefits accorded by the automatic stay  
28 to allegedly not only stop the foreclosure, protect its illusory equity, but allow more time and

means for Debtor to sell the Lands, and provide time and means for Paramount Claim Holder to, among other things, record a financing statement, deposit \$999,999,999.99 Bonds with the court clerk and transfer the Lands allodial title(s) and deeds to Paramount Claim Holder with prejudice and without recourse.

**1. Illusory Claims Allegedly Secured by the Lands**

**i. Inferno Investments Inc.**

Pursuant to an alleged and otherwise illusory Proof of Claim (“Inferno IPOC”) filed by Inferno Investments, Inc. (“Inferno”), it appears Inferno asserts a claim in the amount of \$20,902,106.12, which Inferno allegedly asserts is secured by an illusory Deed of Trust that was allegedly recorded on March 13, 2013 (See Claim Number 11).

On January 01, 2016, it appears the Debtor and Inferno allegedly entered into an agreement (“Subordination Agreement”) wherein the parties allegedly agreed that proceeds from the sale of the Lands would be distributed as described therein.

**ii. The Mechanic’s Lien Holders**

Allegedly after the initial financing from Inferno, it appears the Debtor allegedly commenced “construction” of the Lands. The following parties allegedly provided goods and services to allegedly improve the Lands: J&E Texture, Inc., American Truck & Tool Rentals Inc., Kennco Plumbing Inc., JMS Air Conditioning, Parquet by Dian, Powertek Electrical Inc., and BMC West LLC (collectively referred to herein as the “Mechanic’s Lien Holders”).

**iii. Hanky Capital, LLC**

Pursuant to claim number 20 allegedly filed by Hanky, and the Hanky IPOC, it appears Hanky allegedly asserts a claim in the amount \$122,638,623.41, which Hanky allegedly asserts is secured by two separate illusory Deeds of Trust dated November 6, 2018 (“Principal Hanky IDOT”) and December 10, 2019, respectively. (See Claim number 20). The illusory Principal Hanky Deed of Trust allegedly stem from a loan Hanky allegedly provided to Debtor in the alleged initial amount of \$82,500,000.00 allegedly on or about October 31, 2018 (“Principal Hanky Loan”). (See Claim number 20, Exhibit A.) It appears

1 the alleged Principal Hankey Loan is allegedly evidenced by an illusory promissory note.

2                  iv. Yogi Securities Holdings, LLC

3                  Pursuant to an illusory Proof of Claim ("Yogi IPOC") filed by Yogi Securities Holdings  
4 LLC ("Yogi"), it appears Yogi allegedly asserts a claim in the alleged amount of  
5 \$24,385,366.77 which Yogi allegedly asserts is secured by an Illusory Deed of Trust  
6 allegedly dated on or about August 30, 2019. (See Claim number 27)

7                  v. Hilldun Corporation

8                  Pursuant to an illusory Proof of Claim ("Hilldun IPOC") filed by Hilldun Corporation  
9 ("Hilldun"), it appears Hilldun allegedly asserts a claim in the alleged amount of  
10 \$5,000,000.00, which Hilldun allegedly asserts is secured by an illusory Deed of Trust  
11 allegedly dated September 04, 2020 ("Hilldun IDOT"). (See Claim number 09)

12                  **2. Debtor's Alleged Efforts to Sell the Mistaken Lands**

13                  i. Alleged Turnover of Lands from Receiver and Alleged Negotiations

14                  ii. Regarding Alleged Access to Lands

15                  When Counselor became Counsel as Paramount Claim Holders general bankruptcy  
16 counsel, it appears the Lands were allegedly under the control of a Receiver. It appears  
17 Counselor was unaware that Levene, Neale, Bender, Yoo & Golubchik ("LNBYG"), with  
18 the alleged assistance of Debtor's unidentified managers, unidentified Sierra Constellation  
19 Partners, LLC ("SCP") had allegedly negotiated an illusory interim stipulation with Hankey  
20 and the unidentified Receiver allegedly regarding access to the Lands ("Receiver  
21 Stipulation") to allegedly facilitate efforts to employ alleged professionals to allegedly assist  
22 the Debtor in marketing and selling the Lands, thereafter, the alleged unidentified Receiver  
23 allegedly voluntarily turned over the Lands and all other property of the estate on December  
24 01, 2021.

25                  ii. The Alleged Employment of the Real Estate Brokers and Auctioneer

26                  After allegedly resolving the alleged turnover issues, it appears the Debtor allegedly  
27 sought to employ certain alleged professionals to assist the Debtor in marketing and selling  
28 the mistaken Lands. Allegedly pursuant to this strategy, it appears the Debtor allegedly

1 entered into illusory employment agreements with The Beverly Hills Estates and Compass  
2 (jointly "Brokers") allegedly on or about December 03, 2021, and concierge Auctions, LLC  
3 ("Auctioneer") allegedly on or about December 13, 2021. It appears the alleged specific  
4 duties of the Brokers and Auctioneer allegedly included: (1) marketing and showing the  
5 Lands to illusory prospective buyers; (2) assisting the Debtor in obtaining and providing due  
6 diligence materials to prospective buyers; (3) notifying prospective buyers of the illusory  
7 intended online auction ("Illusory Auction") of the Lands and the illusory bid procedures  
8 unlawfully approved by the court after receipt of timely lawful Creditor Objections to  
9 Discharge ("Unlawful BK Bid Procedures") governing the illusory Auction; (4) receiving  
10 illusory bids from illusory prospective buyers; (5) conducting the illusory Auction of the  
11 Lands pursuant to Unlawful BK Bid Procedures unlawfully approved by the court with the  
12 ultimate unlawful illusory sale subject to dishonorable Court approval; (6) consulting with  
13 the Debtor and its alleged professional advisors regarding the alleged foregoing; and (7)  
14 performing any other illusory services which may be allegedly appropriate in alleged  
15 connection with the Brokers and Auctioneers illusory retention by the Debtor. Thereafter, it  
16 appears the Debtor allegedly filed an application to approve the illusory employment of the  
17 Brokers and Auctioneer, which was allegedly approved by the Court on January 10, 2022.  
18 (See Dockets 74 and 104)

19                   iii. Sale of the Property

20         It appears the brokers and Auctioneer were not successful in illusorily selling the Lands.  
21 On March 28, 2022, more than thirty (30) days after tendering Paramount Claim Holders  
22 unrebutted Lawful Creditors Objection ("PCH Unrebutted Lawful Creditors Objection") on  
23 February 16, 2022. (See Docket number 128) it appears the Court entered an, hereby  
24 declared, illusory Order ("Illusory Sale Order"), over PCH Unrebutted Lawful Creditors  
25 Objection and numerous other alleged and illusory secured creditors, illusorily granting  
26 Debtors March 08, 2022 motion seeking authority to illusorily sell the mistaken Lands  
27 ("Illusory Sale Motion"). [See Dockets 128, 142, 191, 192, 193, 196, 198, 201, 202, 208,  
28 and 247]. Pursuant to the illusory Sale Order, the Debtor allegedly realized \$126 Million.

1 plus an alleged rebate of \$11.970 million from the Auctioneer, for a total of \$137.97 million  
2 in, hereby declared, fraudulent consideration ("Fraudulent Sale Proceeds").

3 After the Court unlawfully granted the Illusory Sale Motion it appears Inferno and Nile  
4 Niami allegedly appealed the Illusory Sale Order ("Appeals"), [See Dockets 249, 270]. In  
5 response, it appears the Debtor allegedly filed its own appeal allegedly to preserve certain  
6 illusory issues on appeal ("Cross-Appeal"), [See Docket 272]. It appears after the unlawful  
7 entry of the Illusory Sale Order, Debtor has allegedly been engaged in extensive litigation  
8 involving the distribution of the Fraudulent Sale Proceeds to its alleged illusory secured  
9 creditors.

10 Additionally, Paramount Claim Holder, by and through Counselor, has taken all  
11 necessary steps to preserve the likes and or otherwise its timely lawful creditor objection  
12 and paramount claim including, but not limited to: (1) duly removing the U.S. Department  
13 of Justice Trustee and its Offices ("Removed UST") as Trustee and appointing Judicial  
14 Officer Deborah J. Saltzman as Trustee; (2) corrected by errata the Bond number appearing  
15 on the original Bonds filed February 16, 2022; (3) placed several domestic and international  
16 liens on each and every dishonorable/moral turpitude/ad hominem actor/party; (4) recorded  
17 Paramount Claim Holders Deed conveyancing the Lands to Paramount Claim Holders estate  
18 with Los Angeles County **Registrar-Recorder/County Clerk**; (5) recorded *the-one bel air*  
19 Trust Certification with the above-captioned tribunal clerk office; (6) recorded Paramount  
20 Claim Holders Deed conveyancing the Lands to *the-one bel air trust*; (7) Bonded the  
21 adversarial action. (8) moved the above-captioned tribunal numerous times for various  
22 reasons including but not limited to ordering, demanding, and commanding Full Settlement  
23 and Closure.

24 **B. The Appeals**

25 It appears the appeal allegedly filed by Inferno was allegedly voluntarily dismissed by  
26 Inferno after Inferno allegedly filed that certain "*Stipulation to Dismiss Appeal Filed by*  
27 *Inferno Investment, Inc., Pursuant to Federal Rule of Bankruptcy Procedure 8023*"  
28 ("Inferno Stipulation"). Shortly thereafter, it appears the Debtor allegedly voluntarily

1 dismissed the Cross-Appeal after it allegedly filed that certain “*Stipulation to Dismiss*  
2 *Appeal Filed by Crestloyd, LLC Pursuant to Federal Rule of Bankruptcy Procedure 8023*  
3 (“Crestloyd Stipulation”).

4 **C. The Adversarial Proceedings**

5 It appears on or about June 09, 2022, Inferno allegedly initiated an adversarial  
6 proceeding titled *Inferno v. Crestloyd LLC, et al.*, 222-ap-01125-ds (“Adversarial Action”)  
7 when Inferno allegedly filed that certain “*Complaint of Inferno Investments, Inc. for: (1)*  
8 *Declaratory Relief; (2) Unfair Business Practices; (3) Disallowance of Claims; (4)*  
9 *Recission*

 (“Adversarial Complaint”). [See Adversarial Docket 1].

10 **1. Background – Alleged Motion to Pay Hankey Capital**

11 On May 24, 2022, it appears the Debtor, allegedly with the assistance of LNYBG,  
12 allegedly filed that certain “*Motion for Authority to Disburse Funds to Hankey Capital,*  
13 *LLC, an alleged illusory Senior Secured Creditor*” (“Hankey Remittance Motion”) [See  
14 Docket 325], whereby it appears the Debtor allegedly sought the Courts illusory authority to  
15 disburse \$103,837,545.86 to Hankey, an amount that allegedly represented the alleged  
16 principal, interest, and foreclosure fees allegedly owed to Hankey in consideration for the  
17 alleged Principal Hankey Loan. The Debtor allegedly argued that the Hankey Remittance  
18 Motion was justified allegedly based on the fact that (1) as a result of the illusory  
19 Subordination Agreement, the alleged illusory Principal Hankey Loan is allegedly senior to  
20 the claims asserted by Inferno, Yogi, and Hilldun; and (2) making such a distribution was in  
21 the best interest of the estate because if the Debtor did not satisfy the Principal Hankey  
22 Loan, then the illusory Principal Hankey Loan would continue to accrue interest as an  
23 alleged rate of about \$36,666.00 per day.

24 In response, it appears Inferno allegedly filed an opposition to the Hankey Remittance  
25 Motion (“Inferno Opposition to the Motion to Pay Hankey”) [See Docket 337] through  
26 which Inferno allegedly argued that it would be improper for the Court to grant the Hankey  
27 Remittance Motion due to alleged issues concerning the enforceability of the Subordination  
28 Agreement. (“Opposition to Hankey Remittance Motion”). Furthermore, it appears Yogi

1 allegedly filed its own limited opposition to the Hankey Remittance Motion ("Yogi  
2 Opposition to Hankey Remittance Motion") [See Docket 338] through which it appears  
3 Yogi allegedly argued that the Court should not grant the Hankey Remittance Motion to the  
4 extent that the Debtor allegedly sought authorization to pay Hankey anything over  
5 \$82,500,000.00 million, the alleged principal on the Principal Hankey Loan, because there  
6 allegedly existed a good faith dispute regarding the priority of the interest on the Principal  
7 Hankey Loan.

8 Additionally, it appears the Debtor allegedly filed its own reply to both the Inferno  
9 Opposition to Hankey Remittance Motion and the Yogi Opposition to Hankey Remittance  
10 Motion. [See Docket 340].

11 Allegedly after a hearing on the Hankey Remittance Motion was held on May 26, 2022  
12 ("Hearing for Hankey Remittance Motion"), it appears the Court allegedly entered an order  
13 (1) authorizing the Debtor to pay Hankey the sum \$82,500,000.00 on account of Hankey's  
14 asserted illusorily secured claim(s) in the Debtor's Chapter 11 bankruptcy case; (2) ordering  
15 that such payment would be without prejudice to any and all parties' rights to assert claims  
16 and defenses as may be appropriate, including but not limited to the right to drawback any  
17 portion of the monies paid; and (3) continuing the hearing on the Hankey Remittance  
18 Motion to June 23, 2022, allegedly in order for the Court to consider payment of any  
19 amounts in excess of the \$82,500,000.00 [See Docket 348]. In response, it appears on June  
20 2, 2022, the Debtor allegedly filed its Supplemental Brief in Support of the Hankey  
21 Remittance Motion [See Docket 355] allegedly further arguing that it should be authorized  
22 to disburse funds to Hankey in the total amount of \$103,837,545.86. It appears, thereafter,  
23 on June 9, 2022, both Yogi and Inferno filed their own supplemental briefs in opposition to  
24 the Hankey Remittance Motion ("Supplemental Briefs IOT HRM") [See Dockets 359, 361].  
25 Moreover, in addition to filing its own supplemental brief in opposition to the Hankey  
26 Remittance Motion [See Docket 361], Inferno allegedly initiated the Adversarial Proceeding  
27 by filing the Adversarial Action on June 8, 2022 [See Adversarial Docket 1]. It appears,  
28 adversely, allegedly in its Reply to the Supplemental Briefs IOT HRM [See Docket 365], the

1 Debtor submitted that it could not make the distribution contemplated by the Hankey  
2 Remittance Motion by the Hankey Remittance Motion.

3 As of today, it appears the alleged material issues concerning the characterization and  
4 priority of the secured claims are allegedly being resolved through the adversarial  
5 proceedings.

6 **2. The Adversarial Complaint**

7 Through the Adversarial Complaint, it appears Inferno allegedly argues that the Inferno  
8 IPOC allegedly maintains priority over all other secured claims, except Paramount Claim  
9 Holder, based on the following set of facts: (1) Inferno allegedly loaned money to the  
10 Debtor in order for the Debtor to acquire the Lands; (2) after lending the Debtor money,  
11 Inferno and the Debtor allegedly entered into an illusory Memorandum of Agreement  
12 ("MOA") whereby the parties agreed that the fraudulent proceeds from the illusory sale of  
13 the Lands would be used to repay loans obtained from a bank or third parties, before the  
14 Debtor and Inferno receive any proceeds, and that Inferno's written approval was required  
15 before its illusory interest in the Lands could be illusorily subordinated to that of other  
16 secured lenders, particularly Paramount Claim Holder; but (3) the MOA is allegedly of no  
17 force and effect because the Debtor allegedly made some mistakes that do not amount to  
18 fraud nor misappropriation of tens of millions of dollars; Nevertheless, (4) Inferno's illusory  
19 secured claims allegedly maintain illusory priority over the Debtor's other secured creditors  
20 except Paramount Claim Holder. (*See* Adversarial Complaint). On or about August 10,  
21 2022, it appears the Debtor allegedly filed its answer to the Adversarial Complaint,  
22 allegedly, denying the material allegations presented in the Adversarial Complaint and  
23 asserting valid and proper affirmative defenses. [*See* Adversarial Docket 26].

24 **3. Debtor's Cross-Claim**

25 It appears in addition to allegedly assisting the Debtor in connection with its answer to  
26 the Adversarial Complaint, in response to the Adversarial Complaint, the Debtor, allegedly  
27 with the assistance of LNBYG, allegedly continued to investigate the nature, extent, and  
28 validity of each of the secured claims and the alleged liens securing them. Allegedly through

1 “diligent” analysis and investigation, LNYG erred in determining that misconduct on the  
2 part of the Debtor’s principals and entities controlled by the Debtor’s principals, Inferno,  
3 Yogi, Hilldin, and certain principals of the Debtor’s secured creditors (“Cross-Complaint  
4 Defendants”), allegedly caused injury to the Debtor. It appears the Debtor allegedly filed its  
5 own cross-complaint in the Adversarial Proceeding (“Adversarial Cross Complaint”) [See  
6 Docket 27] allegedly seeking redress for such injuries caused by the Cross-Complaint  
7 Defendants pursuant to alleged claims (1) to allegedly recharacterize debt as equity, (2) for  
8 illusory equitable subordination, (3) for illusory declaratory relief, (4) for breach of  
9 fiduciary duties, and (5) to disallow certain claims.

10       **4. Yogi’s Counterclaim**

11       Allegedly in response to the Adversarial Cross-Complaint it appears Yogi allegedly  
12 filed its own first amended counterclaim (“Yogi Counterclaim”) [See Adversarial Docket  
13 55], for which the Debtor allegedly filed its own Answer to on or about October 12, 2022  
14 [See Adversarial Docket 68].

15       **5. Settlement of Claims Against Englanoff Defendants**

16       Allegedly, it appears among the claims asserted by the Debtor in the Adversarial  
17 Proceedings were claims for avoidance of fraudulent conveyances in favor of Justine  
18 Englanoff, Nicole Englanoff, and Jacqueline Englanoff (“Englanoff Defendants”). It appears  
19 allegedly after extensive settlement agreement, the Debtor allegedly filed a motion to  
20 approve the settlement. It appears the Motion was approved pursuant to an order entered on  
21 October 23, 2023 [See Docket 533]. It appears the settlement amount has allegedly been  
22 paid to the estate and allegedly being maintained pending further order of this Court.

23       **6. Mediation**

24       Allegedly Notwithstanding continued litigation, it appears the parties to the Adversarial  
25 Proceeding agreed to attempt to resolve their claims through mediation. It appears numerous  
26 sessions of mediation were allegedly held before the Judicial Officer Sheri Bluebond  
27 (“Bluebond”). It appears such sessions were allegedly attended by Hankey and Inferno,  
28 since those are the alleged primary parties to the dispute and, absent a resolution among

Andre Mario Smith National Banking Association.

1 such parties, it would not be productive to include others. It appears, allegedly  
2 notwithstanding Bluebond's continued efforts, an agreement was allegedly not reached and  
3 the mediation was allegedly concluded.

4 It appears litigation allegedly commenced once again thereafter. It appears the parties  
5 allegedly held their early meetings of counsel and prepared initial disclosures. It appears  
6 certain written discovery allegedly has been propounded and responded to. Additionally, it  
7 appears the parties have allegedly entered into a stipulation to allow Inferno to amend its  
8 complaint against Hankey, which stipulation was approved pursuant to order of this Court  
9 entered on October 28, 2024. [See Docket 286].

10 It appears a status conference in the adversary proceeding is currently scheduled for  
11 January 25, 2025.

12 **D. Other Significant Events During the Bankruptcy**

13 **1. Motion to Pay Certain Secured Creditors**

14 It appears on or about May 26, 2022, LNYBG allegedly assisted the Debtor in filing that  
15 certain "*Motion for Authority to Pay Certain Senior Creditors*" ("Motion to Remit Payments  
16 to Mechanic's Lien Holders") [See Docket 319]. It appears allegedly through a Motion to  
17 Remit Payments to Mechanic's Lien Holders, the Debtor allegedly requested that the Court  
18 authorize the Debtor to pay amounts owed to the Mechanic's Lien Holders in the following  
19 alleged amounts: (a) J&E Texture, Inc. → \$292,300.86; (b) American Truck & Tool Rentals  
20 Inc. → \$160,000.00 (Reduced pursuant to Stipulation [See Dockets Number 304, and 305]);  
21 (c) Kennco Plumbing Inc. → \$85,560.17; (d) JMS Air Conditioning → \$51,290.00; (e)  
22 Parquet by Dian → \$40,846.00; (f) Powertek Electrical Inc. → \$40,480.00; (g) BMC West  
23 LLC → \$2,399.00.

24 It appears allegedly after holding a hearing on the Motion to Remit Payments to  
25 Mechanic's Lien Holders, the Court entered an order granting the Motion to Remit  
26 Payments to Mechanic's Lien Holders. [See Docket 354].

27 **2. Vesta Administrative Expense Claim, Related Litigation, and Compromise**

28 It appears on or about June 3, 2022, Showroom Interiors, LLC dba Vesta ("Vesta")

Andrea Marie Smith National Banking Association

1 allegedly filed that certain “*Request for Payment of Chapter 11 Administrative Expenses of*  
2 *Showroom Interiors, LLC*” (“Vesta Administrative Expense Request”) [See Docket 357]  
3 whereby Vesta allegedly requested the allowance and payment of an administrative of an  
4 administrative claim in the amount \$320,283.04 as a result of damages allegedly caused by  
5 the Debtor for furniture allegedly leased by the Debtor from Vesta. Allegedly in response, it  
6 appears the Debtor filed a limited objections to the Vesta Admin Expense Request  
7 (“Objection to Vesta Admin Expense Request”) [See Docket 367], whereby the Debtor  
8 allegedly disputed the extent and validity of the Admin Expense Request. One week later,  
9 Vesta filed a reply to the Objection to Vesta Admin Expense Request. [See Docket 383]

10 It appears on July 21, 2022, allegedly the Court held a hearing to consider the Vesta  
11 Admin Expense Request (“Vesta Admin Expense Request Hearing”), which allegedly  
12 resulted in the Court entering an Order (“Continuation Order”) continuing the Vesta Admin  
13 Expense Request to September 08, 2022, allegedly in order for Vesta and the Debtor (1) to  
14 attempt to settle the Vesta Admin Expense Request ; or (2) if settlement was not possible,  
15 give the parties additional time to draft supplemental briefs in support of, or opposition to,  
16 the Vesta Admin Expense Request. [See Docket 391]

17 It appears after the Court allegedly entered the Continuation Order, the Debtor and Vesta  
18 entered into settlement negotiations, the terms of which are memorialized in that certain  
19 “*Stipulation Resolving Request for Payment of Chapter 11 Administrative Expenses of*  
20 *Showroom Interiors, LLC dba Vesta*” (“Vesta Stipulation”). [See Docket 413].

21 Paramount Claim Holder received no notices regarding any of this.

22 **3. Monthly Operating Reports**

23 Allegedly throughout the Covered Period, it appears LNYG assited the Debtor in  
24 preparing its Monthly Operating Reports (“MORs”). Counselor creates and maintains  
25 internal monthly operating reports for Paramount Claim Holder during the Covered Period.

26 **4. SCP’s Monthly Fee Statements**

27 It appears throughout the Covered Period, LNYG allegedly assisted SCP in drafting its  
28 monthly fee statements (jointly/severally “Monthly Fee Statements”, individually “Monthly

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1 Fee Statement") for each month of employment.

2       **5. Additional Motions and Pleadings Filed by Edward Roark Schwagerl**

3       It appears Edward Roark Schwagerl ("Roark"), who is not a creditor, secured, illusorily  
4 nor otherwise, in this action and not a party to any proceedings, has filed several very  
5 insightful and informative motions and pleadings asserting an alleged and otherwise  
6 illusory, at best, interest in the Lands and allegedly seeking relief related thereto. It appears  
7 LNYBG allegedly opposed the motions, where appropriate. It appears in other instances, the  
8 Court allegedly issued its own orders denying the relief requested by Roark. Counselor  
9 exhausted hundreds of hours researching, developing, objecting and rebutting, where  
10 applicable, Roark numerous pleadings.

11       **E. Fees and Expenses Previously Requested**

12       It appears on or about May 05, 2022, LNYBG allegedly filed that certain "*First Interim*  
13 *Application of Levene, Neale, Bender, Yoo & Golubchik L.L.P., For Approval of Fees and*  
14 *Reimbursement of Expenses*" ("First Interim Fee Application") [See Docket 306] allegedly  
15 whereby LNYBG sought the Court's approval to collect the fees allegedly incurred by  
16 LNYBG and reimbursement of expenses allegedly incurred during the pendency of the  
17 Debtor's chapter 11 bankruptcy case allegedly for the period of the Petition Date of October  
18 26, 2021, through and including April 15, 2022.

19       It appears thereafter, Inferno allegedly filed a limited opposition to LNYBG's First  
20 Interim Fee Application ("Limited Opposition to First Interim Fee Application") [See  
21 Docket 314], allegedly arguing that the Court should not approve the First Interim Fee  
22 Application to the extent that LNYBG sought authorization to pay fees and costs exceeding  
23 the amount for restructuring costs for professional and Removed UST fees set forth in the  
24 alleged budget ("Budget") approved by Hankey as lender on the Debtor's alleged debtor in  
25 possession loan ("DIP Loan") and by the Court pursuant to a final order granting the motion  
26 to approve the DIP Loan. (See Limited Opposition to First Interim Fee Application) [See  
27 Docket 320] allegedly arguing, briefly, that there were no Budget restrictions on the amount  
28 available to pay LNYBG or Removed UST fees because the DIP Loan was paid in full. (See

1 December 08, 2023, on December 08, 2023, this Court entered its order approving the  
2 Second Interim Fee Application and allowin fees of \$300,000.00 and costs of \$21,221.81.  
3 [See Docket 457]. The allowed fees and costs were paid by the Debtors' estate.

4 It appears on November 06, 2023, LNYBG filed that certain "*Third Interim Application*  
5 *of Levene, Neale, Bender, Yoo & Golubchik L.L.P for Approval of Fees and Reimbursement*  
6 *of Expenses*" ("Third Interim Fee Application") [See Docket 547] whereby LNYBG sought  
7 the Court's approval to collect the fees incurred by LNYBG and reimbursement of expenses  
8 incurred during pendency of the Debtor's chapter 11 bankruptcy case for the period of  
9 November 01, 2022, through and including October 31, 2023. It appears pursuant to the  
10 Third Interim Fee Application, LNYBG sought fees in the amount of \$114,614.50 and  
11 expenses in the amount of \$3,538.94 for total fees and expenses in the amount of  
12 \$118,153.44.

13 It appears on or about November 16, 2023, Inferno allegedly filed its reservation of  
14 rights with respect to the Third Interim Fee Application. [See Docket 542].

15 It appears on or about December 01, 2023, this Court entered its order approving the  
16 Third Interim Fee Application and allowing the requested fees and costs. [See Docket 545].  
17 The allowed fees and costs were paid by the Debtors' estate.

18 **F. Cash on Hand and Estimated Amount of Other Accrued and Unpaid Expenses of**  
19 **Adminstration**

20 It appears LNYBG is allegedly informed and believes that as of November 14, 2024, the  
21 Debtor has sufficient funds on hand, which is allegedly separate from approximately  
22 \$37,500,000.00 proceeds allegedly maintained in a segregated account. Counselor research  
23 and development agrees. It appears LNYBG alleges it is further informed and believes that  
24 (1) the other "professionals" employed by the estate were paid in full upon the illusory close  
25 of escrow for the illusory sale of the Lands, (2) SCP/Lawrence R. Perkins, the Debtor's  
26 alleged Non-member Manager, has allegedly generally been paid current on a monthly basis  
27 pursuant to notice and payment procedures approved by the Court [See Dockets 70, 77], and  
28 (3) the Debtor is allegedly generally current on all other post-petition obligations. As a

1 result it appears more than sufficient funds exist to pay the fees and costs requested/  
2 demanded in this Application.

3 **G. Narrative Statement of Services Rendered, Time Expended, and Fees Charged**  
4 **For Each Billing Category**

5 When recording its time, Counselor places all time entries for fees into one of 14  
6 (fourteen) categories. These categories consist of (1) Asset Analysis and Recovery, (2)  
7 Asset Disposition, (3) Business Operations, (4) Case Administration (5) Claims Ad-  
8 ministration and Objections, (6) Employee benefits/Pensions, (7) Fee/Employment  
9 Applications, (8) Fee/Employment Objections (9) Financing, (10) Relief from Stay, (11)  
10 Creditor Meet & Confer(s), (12) Plan and Disclosure Statement(s) (20) Other Litigation (99)  
11 Miscellaneous. Some time entries do not fit into any particular category, and some time  
12 entries cross over into more than one category. Counselor does his best to place time entries  
13 into categories which most accurately reflect the work performed. Nevertheless, there will  
14 be some time entries dealing with the same subject matter have been placed into multiple  
15 categories.

16 **1. Asset Analysis and Recovery (01)**

17 During the covered period Counselor billed 1,359.9 hours and incurred \$679,950.00  
18 fees in this category. Fees in this category addressed researching, developing, evaluating,  
19 among others, Debtors', Richard Saghians', and Paramount Claim Holders' assets to  
20 understand their efficiency, productivity, and potential risks. Counselor prepared and filed  
21 several pleadings, objections, and Motions, among other things, to recover the Lands from  
22 fraudulent transfers.

23 **2. Asset Disposition (02)**

24 During the covered period Counselor billed 339.9 hours and incurred \$169,950.00  
25 fees in this category. Fees in this category addressed researching, developing, analyzing  
26 and/or responding to, among others, Debtor, Richard Saghan, Roark, Inferno, Yogi, SPC,  
27 Hankey, Hilldun, Englanoff Defendants, and Mechanics Lien Holders numerous filings  
28 seeking to undermine or otherwise ignore Paramount Claim Holders paramount claim. It

1 appears Paramount Claim Holders orders, commands, demands and objections were  
2 illusorily ignored/denied by the Court, however, each unrebuted affidavit stands as the real  
3 valid and proper judgment, further sayeth naught.

4       **3. Business Operations (03)**

5              During the Covered Period, Counselor did not bill any time in this category.  
6 Counselor reserves and exercises all rights.

7       **4. Case Administration (04)**

8              During the covered period Counselor billed 339.9 hours and incurred \$169,950.00  
9 in fees in this category. Fees included in this category are fees incurred by Counselor  
10 researching, developing, preparing, editing, finalizing, reviewing, drafting and/or revising  
11 documents and/or pleadings related to administrating the case.

12              Time in this category also includes researching, developing, and removing the United  
13 States Trustee and its Offices as Trustee.

14              Time in this category includes fees incurred by Counselor researching, developing,  
15 attempting to correspond with, and analyzing correspondence from relevant parties related  
16 to fraudulent transfers, illusory sale of Lands, malicious prosecutions in the State of  
17 California Superior Court, among many other things.

18              Finally, time in this category also included researching, developing remedies as it  
19 relates to those whom ignored Paramount Claim Holders timely lawful creditors  
20 objection(s).

21       **5. Claims Administration and Objections (05)**

22              During the Covered Period Counselor billed 339.9 hours and incurred \$169,950.00  
23 in fees in this category. Fees included in this category incurred by Counselor researching,  
24 developing, preparing, finalizing, analyzing, editing and reviewing objections.

25       **6. Employee Benefits/Pensions (06)**

26              During the Covered Period, Counselor did not bill any time in this category.

27       **7. Fee/Employment Applications (07)**

28              During the Covered Period Counselor billed 169.9 hours and incurred \$84,500.00 in

1 fees in this category. Included in this category are fees incurred by Counselor researching,  
2 developing, preparing, editing, finalizing, reviewing, drafting and/or revising documents  
3 and/or pleadings related to LNYBG several fee applications, LNYBG current fee  
4 application, Roark numerous filings amounting to more than \$144,000,000.00, the  
5 MOAs, Monthly Fee Statements, the avos bank statements, and East West Bank Statements.

6       **8. Fee/Employment Objections (08)**

7              During the Covered Period Counselor billed 84.0 hours and incurred \$42,450.00 in  
8 fees in this category. Included in this category are fees incurred by Counselor researching,  
9 developing, preparing, editing, finalizing, reviewing, drafting and/or revising documents,  
10 objections and/or pleadings related to LNYBG several fee applications, and Removing  
11 Removed UST.

12       **9. Financing (09)**

13              During the Covered Period, Counselor did not bill any time in this category.

14       **10. Relief From Stay (10)**

15              During the Covered Period, Counselor did not bill any time in this category.

16       **11. Meeting of Creditors (11)**

17              During the Covered Period, Counselor did not bill any time in this category.

18       **12. Plan and Disclosure Statement (12)**

19              During the Covered Period, Counselor did not bill any time in this category.

20       **20. Other Litigation (20)**

21              During the Covered Period Counselor billed 2.975.5 hours and incurred  
22 \$1,487,750.99. Before during and after the illusory sale of the Lands, the primary remaining  
23 issue is preserving Paramount Claim Holders paramount claim by way of full settlement and  
24 closure and liquidating the Bonds to remit payment to all alleged claimants. Counselor is not  
25 an attorney; therefore, extensive research and development [a]mounting to thousands of  
26 hours were expended by Counselor researching, developing, preparing, editing, finalizing,  
27 reviewing, drafting and/or revising documents, objections, pleadings, motions, the likes  
28 and/or otherwise for the benefit of Paramount Claim Holder. Counselor has appeared at

every hearing on the adversarial case, bankruptcy proceedings, and the subsequent appeals.

Counselor has litigated extensively on behalf of Paramount Claim Holder, appeared at Los Angeles County Registrar Recorder Clerks office by appointment at least 6 times and walk-in several times. Counselor has been held at the above captioned tribunal and threatened with detainment/arrest on several occasions in connection with this matter. Counselor has been held for a total of 128 hours at Los Angeles County Jail in connection with the above-captioned case for Paramount Claim Holder, and attended numerous State of California Superior Court "hearings" in connection with this matter for malicious prosecutions of Paramount Claim Holder initiated by Richard Saghian and/or his authorized agents related and connected to this case.

**14. Miscellaneous (14)**

During the Covered Period, Counselor did not bill any time in this category.

**H. Specific Listing of All Time Spent by the Professional on the Matter for Which Compensation is Sought**

Annexed hereto as Annexed "I" is a detailed listing of all the time that Counselor spent during the Covered Period for which Counselor seeks compensation including the date Counselor rendered the service(s), a description of the service, the amount of time spent and a designation of the person who rendered the service for the period of time within the Covered Period. Also included in Annexed "I" is a breakdown of time entries into the activity codes maintained by Counselor.

**I. Specific Listing of Expenses by Category**

Attached hereto as Annexed "II" is a summarized listing by category and an itemization of all expenses that Counselor advanced on behalf of the Debtor as, pursuant any/all Bankruptcy/Equity Rules of Court, Debtor is accountable, responsible the likes and/or otherwise for Paramount Claim Holders, a Creditor, fees and cost during the Covered Period. These include Counselors expenses incurred, including, but not limited to, photocopying, long distance phone calls, telecopying, mailing, and hiring messenger services. Counselor generally handles regular and routine photocopying in-house for which

1 Counselor charges clients (\$0.20) cents per page. Counselor believes that this is less than  
2 Counselor actual expenses incurred with regard to the photocopying machines, supplies and  
3 labor associated with providing photocopying services. Counselor maintains physical  
4 receipts created from each printer used which clearly indicates the number of copies  
5 included in each print job.

6 Counselor does use outside copy services for large copying projects that charge bulk  
7 rates for photocopying. In these instances, Counselor charges clients the same amount that  
8 Counselor pays the outside service.

9 Counselor charges clients \$1.00 per page for sending telecopies and \$.20 per page for  
10 receiving telecopies which Counselor believes is less than Counselor's actual expenses  
11 incurred with regard to telecopying. All expenses that Counselor advanced on behalf of the  
12 Debtor, as, pursuant any/all Bankruptcy/Equity Rules of Court, Debtor is accountable,  
13 responsible the likes and/or otherwise for Paramount Claim Holders, a Creditor, fees and  
14 cost during the Covered Period, were necessarily incurred and are properly charged as  
15 administrative expenses of the Debtor's Chapter 11 estate.

16 When Counselor paid services such as Lexis Nexis, Counselor records the client's  
17 account number or case name for the research to be performed. Each month Counselor  
18 creates an invoice which reflects both an aggregate total of charges incurred by Counselor  
19 for the month, as well as a break out of the specific charges incurred on behalf of each client  
20 (identified by name or case number or client account number). The amount(s) reflected on  
21 the monthly invoice is then entered by Counselor to the appropriate client account number  
22 as identified on the invoice. There is no profit or other additional charge added to the  
23 amount reflected from vendors such as Lexis Nexis.

24 **J. Description of Professional Education**

25 Counselor is a one man operation that specializes, for over twenty one (21) years, in  
26 and limits its practice to matters of self-representation including, but not limited to Creditor  
27 matters, matters of insolvency, reorganization and bankruptcy law, and other litigation  
28 matters, and is well qualified to self-represent Paramount Claims Holder. Counselor is not

1 admitted to practice law in the California courts nor in the United States District Court for  
2 the Central District of California, however, still required to perform at the competency level  
3 and/or higher, and therefore entitled to his fees and reimbursement of his costs.

4 **III.**

5 **Law Standard**

6 Prior to the enactment of the Bankruptcy Code, the rule with respect to compensation  
7 requests in the Ninth Circuit was that the Court should award lawyer's fees in accordance  
8 with a "strict rule of economy test" In re THC Financial Corp., 659 F.2d 951, 955 n.2 (9<sup>th</sup>  
9 Cir. 1981), cert. denied, 456 U.S. 977 (1982). This is no longer the law. The legislative  
10 history to Section 330 of the Bankruptcy Code indicates that Congress was primarily  
11 concerned with protecting the public interest in the smooth, efficient operation of the  
12 bankruptcy system by encouraging competent bankruptcy specialists to remain in the field.  
13 First National Bank of Chicago v. Committee of Creditors Holding Unsecured Claims (In re  
14 Powerline Oil Co.) 71 B.R. 767, 770, (Bankr. 9th Cir. 1986); In re Baldwin-United Corp.  
15 79 B.R. 321, 346 (Bankr. S.D. Ohio 1987). Toward this end, Congress specifically  
16 disavowed notions of economy of administration, and provided that compensation in  
17 bankruptcy case should be comparable to what is charged in nonbankruptcy matters. Id. at  
18 346.

19 Under the lodestar approach, the Court is to determine the number of hours reasonably  
20 expended in a lawyer's representation of a debtor and multiply such numbers by a  
21 reasonable hourly rate for the services performed. See Delaware Valley Citizens' Council  
22 for Clear Air, 478 U.S. at 565; In re Powerline Oil Co., 71 B.R. 770. A reasonable hourly  
23 rate is presumptively the rate the marketplace pays for the services rendered. Missouri v.  
24 Jenkins by Agyei, 491 U.S. 274, 109 S.Ct. 2463 (1989); Burgessy, Klenske (In re Manoa  
25 Finance Co., Inc.) 853 F.2d 687, 691, (9<sup>th</sup> Cir. 1988). Recognizing that the determination of  
26 an appropriate "market rate" for the services of a lawyer is inherently difficult, the Supreme  
27 Court stated:

28 "Market prices of commodities and most services are determined by supply and

Ande Marie Smith national banking association

1 demand. In this traditional sense there is no such thing as a prevailing market rate for the  
2 service of lawyers in a particular community. The type of services rendered by lawyers, as  
3 well as their experience, skill, and reputation, varies extensively – even within a law firm.  
4 Accordingly, the hourly rates of lawyers in private practice also vary widely. The fees  
5 charged often are based on the product of hours devoted to the representation multiplied by  
6 the lawyer's customary rate." Blum v. Stenson, 465 U.S. 886, 895 n.11 (1984). The  
7 Supreme Court has stated that a reasonable lawyer's fee "means a fee that would have been  
8 deemed reasonable if billed to affluent plaintiffs by their own attorneys." Missouri v. Jenkins  
9 by Agyei, 109 S.Ct. at 2470 (quoting City of Riverside v. Rivera, 477 U.S. 561 (1986)  
10 (Rehnquist, J. dissenting)). Accordingly, a reasonable hourly rate is the amount to which  
11 lawyers in the area with comparable skill, experience and reputation typically would be  
12 entitled as compensation. Blum v. Stenson, 465 U.S. at 895 n.11.

13 Counselor respectfully submits that the hourly rates for its lawyer and paraprofessionals  
14 are reasonable and appropriate in the relevant community and in view of the circumstances of  
15 this case, the demands that the case placed on Counselor and Counselor's efforts and the  
16 results achieved by Counselor thus far. Based on all of the foregoing, Counselor submits  
17 that its requested discounted fees and expenses are reasonable and should be approved on an  
18 interim basis.

19 Pursuant Bankruptcy Code Definitions, "Claim" is defined as (a) right to payment,  
20 whether or not reduced to judgment, liquidated, fixed, contingent, matured, unmatured,  
21 disputed, undisputed, legal, equitable, secured or unsecured; or (b) right to an equitable  
22 remedy for breach of performance if such breach gives rise to a right to payment, whether or  
23 not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured,  
24 unmatured, disputed, undisputed, legal, equitable, secured or unsecured § 101(5).

25 Pursuant Bankruptcy Code Definitions, "Creditor" is an entity that has a claim against  
26 the debtor that arose at the time of or before the order for relief concerning the Debtor. §  
27 101(5).

28 As such, Paramount Claim Holder is a Creditor, and Debtor *must* pay Paramount Claim

1 Holders fees and cost.

2 **IV.**

3 **Conclusion**

4 **Wherefore**, Counselor respectfully requests that the Court enters an order:

5 (1) approving the Application;

6 (2) approving, on an interim basis, Counselor fees incurred during the Covered  
7 Period \$1,010,270.98 for total fees and expenses in the amount of \$1,010,270.98

8 (3) authorizing the Debtor to pay Counselor the sum of \$1,010,270.98, which is the  
9 total of fees and expenses incurred during the Covered Period; and

10 (4) granting such other and further relief in favor of Paramount Claim Holder as the  
11 Court deems just and proper. *it is so ordered.*

12 Date: November 25, 2024

13 peacefully; Until then, I am very truly yours,

14 *© 2024 Andre Mario Smith, Esq.*  
15 *by: Smith, Andre Mario el sui juris; esquire.*  
16 *attorney in-fact; lawful counselor for*  
17 *Creditor: Andre Mario Smith*  
18 *all rights reserved and exercised.*

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Andre Mario Smith National Banking Association.

Declaration/Affidavit for *Smith, Andre Mario el sui juri; esquire.*

1. *Smith, Andre Mario el sui juris; esquire*, Declare/Affirm the following: It appears:

2. 1. I am over 18 years of age. Except where otherwise stated, I have personal knowledge  
3. of the facts set forth below and, if called to testify, I could and would testify competently  
4. thereto.

5. 2. I am self representing and otherwise serving as bankruptcy counsel to Andre Mario  
6. Smith, Creditor and paramount claim holder ("Creditor") in this chapter 11 bankruptcy case  
7. filed by Creslloyd, LLC Debtor and Debtor in Possession ("Debtor").

8. 3. I make this Declaration in support of *Smith, Andre Mario el sui juris; esquire*  
9. ("Counselor") Second Interim Application for Approval of Fees and Reimbursement of  
10. Expenses ("Application") to which this Declaration is attached. All capitalized terms herein  
11. which are not defined herein have the same meanings as in the Application.

12. 4. In the ordinary course of Counselor's business, Counselor creates business books and  
13. records ("Records and Books") regarding, among other things, time recorded by Counselor  
14. performing particular tasks for clients and expenses incurred for particular clients.  
15. Counselor's Records and Books are made at or near the time by, or from information  
16. transmitted by, a person with knowledge, in the ordinary course of Counselor's business and  
17. as a regular practice of Counselor's business. The amounts requested in the Application for  
18. compensation of fees and reimbursement of expenses incurred are based on Counselor's  
19. Records and Books. .

20. 5. I am primarily responsible for Creditor's representation, for which Debtor estate is  
21. accountable and/or responsible for paying, as general bankruptcy counsel during Debtor's  
22. Chapter 11 case.

23. 6. I participated in the drafting of the Application to which this Declaration is attached.  
24. To the best of my knowledge, information and belief, all of the matters stated in the  
25. Application are validly and properly alleged or true and correct.

26. 7. All expenses outside services such as photocopying services, messenger and express  
27. mail services, postage, research and development services for which Counselor requests

- 1 reimbursement are the actual expenses incurred by Counselor for such services, and
- 2 Counselor does not seek any additional amounts or profits with respect thereto.

3       8. I have reviewed the requirements of Local Bankruptcy Rule 2016-1, and I believe  
4 that the Application complies with this Rule.

5 I declare and verify under penalty of perjury under the laws of The United States of  
6 America that the foregoing is true and correct.

7 Executed this 25th day of November 2024, at Los Angeles, California.

8 | Date: November 25, 2024

peacefully; Until then, I am very truly yours,

① 2024 *A. M. S.*  
by: Smith *our arr'te.*

*Smith, André Mario el sui juris; esquire.  
attorney in-fact; lawful counselor for  
Creditor: Andre Mario Smith  
all rights reserved and exercised.*

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*Andre Mario Srinin national banking association.*

## Annexed I

Fee Application

Crestlloyd LLC c/o Sierra Constellation  
Larry Perkins, Manager  
355 South Grand Avenue, Suite: 1450  
Los Angeles, California 90071

November 19, 2024

Andre Mario Smith  
**Our File Number:** 220216001

SAM

Professional Services Rendered      January 01, 2022    through    October 31, 2024

Total Professional Hours	2,020.001	Fees	\$1,010,270.98
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Current Period Total Professional Fees and Cost	\$1,010,270.98
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## Detailed Activities

**Crestlloyd LLC**

November 18, 2024 Page Number 01

**Case Number 220216001**

From Date January 01, 2022

To Date December 31, 2022

### **01 Asset Analysis and Recovery**

April 01, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022 & Debtor Assets			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
April 04, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022 & Debtor Assets			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
April 05, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022 & Debtor Assets			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
April 06, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022 & Debtor Assets			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
April 07, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022 & Debtor Assets			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
April 08, 2022	Researching, Developing, Analyzing to Richard Saghian, 944 Airole LLC, Debtor Assets			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
June 17, 2022	Researching, Developing, Analyzing to Richard Saghian, 944 Airole LLC, Debtor Assets			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
		<b>Total</b>	<b>\$14,000.00</b>	<b>28.0</b>

### **02 Asset Disposition**

February 22, 2022 Researching, Developing and/or analyzing Chapter 11 MOR Dkt 129

<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$1,000.00</u>	<u>2.0</u>
February 23, 2022	Researching, Developing and/or analyzing Motion to Extend Exclusivity Period Dkt 130			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$1,500.00</u>	<u>3.0</u>
February 23 2022	Researching, Developing and/or analyzing Roark Motion Dkt 133			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$1,500.00</u>	<u>3.0</u>

**Crestlloyd LLC**      **November 18, 2024**      **Page Number 02**  
**Case Number 220216001**      **From Date January 01, 2022**  
                                        **To Date December 31, 2022**

February 25, 2022      Researching, Developing and or analyzing Debtor Oppostion to Roark Motion Dkt 134

2004001      SAMesje      500.00      \$2,000.00      4.0

February 28, 2022      Researching, Developing and/or analyzing Order Denying Protective Order and Creditor Opposition to Roark sale confirmation Dkt 135;137

2004001      SAMesje      500.00      \$1,500.00      3.0

March 01, 2022      Researching, Developing and Preparing Second Motion For Emergency Protective

2004001      SAMesje      500.00      \$1,000.00      2.0

March 02, 2022      Researching, Developing and Analyzing Debtor MOR and Order on Motion for Protective Order Dkt 139

2004001      SAMesje      500.00      \$3,000.00      6.0

March 07, 2022      Researching, Developing and analyzing Stipulation by debtor and Hilldun re Motion to sell Property and Hilldun Claim Dkt 141

2004001      SAMesje      500.00      \$1,000.00      2.0

March 08, 2022      Researching, Developing and analyzing Motion to Sell Estate Property Free and Clear of liens Dkt 142; 143; 144; 160

2004001      SAMesje      500.00      \$4,000.00      8.0

March 09, 2022      Researching, Developing and analyzing Debtors Ex Parte Application Order Approving Hilldun Stip & Notices to filer Dkt 146;147;148;149

2004001      SAMesje      500.00      \$4,000.00      8.0

March 10, 2022      Researching, Developing and analyzing Notice of Sale of Property Rsd Notice of sale property appl, order apprv shortend notice Dkt 151,152

2004001      SAMesje      500.00      \$4,000.00      8.0

March 11, 2022      Resarching and Developing and analyzing Hearing Notice, Appearance Notice Genevieve Weiner for Richard Saghian Dkt 153; 161

2004001      SAMesje      500.00      \$4,000.00      8.0

March 14, 2022      Researching, Developing and Analyzing Buyers Emergency Motion to Enforce Bid Procedures, Hearing Notice, Lodgment Dkt 162- 166

2004001      SAMesje      500.00      \$4,000.00      8.0

March 15, 2022      Researching, Developing, Analyzing Order Denying Second Seal Motion, order denying full settlement and closure, Obection to emergency motion approving bid procedures Dkt 167; 168; 169

2004001      SAMesje      500.00      \$2,500.00      5.0

## Detailed Activities

Crestlloyd LLC		November 18, 2024	Page Number	03
Case Number 220216001			From Date	January 01, 2022
			To Date	December 31, 2022
March 16, 2022	Researching, Developing, Analyzing Notice/order on Dkt 147 &152 Debtor MFS Dkt 181;182;200; 183;184;185; 186; 187;188;189;190			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
March 17, 2022	Researching, Developing, Analyzing American Truck & Tool Opposition to Dkt 142, J&E Texture Inc Objection to Dkt 142; Yogi Securities Objection to Dkt 142; Buyers Statement Dkt 191;192;193;194;195			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$1,500.00</u>	<u>3.0</u>
March 18, 2022	Researching, Developing, Analyzing Transcript for 01/06/22 hearing: Transcript for 01/13/22 hearing; 197:			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
March 21, 2022	Researching, Developing, Analyzing Debtor Stipulation with American Truck & Tool Rentals Inc, and Texture, Inc.; Richard Saghian Omnibus Reply; Richard Saghian Omnibus Reply Declaration; Richard Saghian Unpublished Opinions Reply dkt 142 Dkt 203; 204; 205; 206; 207			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
March 22, 2022	Researching, Developing, Analyzing Debtor Reply to American Truck & Tool Rentals Inc Opposition, Texture, Inc. Objection, Yogi Securities Holdings, LLC Objection, Nile Niami Objection, Inferno Investments Opposition; Debtor Objection to Anthony Aquino; Debtor Objection to Joseph Englanoff Declaration Dkt 209; 210			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
March 23, 2022	Yogi Securities Errata Dkt 214			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$1,000.00</u>	<u>2.0</u>
March 24, 2022	Researching, Developing, Analyzing Nile Niami Request for Judicial Notice; Yogi Securities Holdings, LLC Reply to Debtor Objection; Request for CD; Debtor Lodgment Notice of Signed Addendum to Purchase Agreement; Stip by Debtor and amended Stip with J&E Texture; Roark Letter of Wishes Dkt 217; 220; 221			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>

## Detailed Activities

<b>Crestlloyd LLC</b>		<b>November 18, 2024</b>	<b>Page Number</b>	<b>04</b>
<b>Case Number</b>	<b>220216001</b>	<b>From Date</b>	<b>January 01, 2022</b>	
		<b>To Date</b>	<b>December 31, 2022</b>	
March 25, 2022	Researching, Developing, Analyzing U.S. Trustee CD Request; Order Approving Debtor Motion Dkt 144; Debtor Exhibit 1 to Dkt 142 Order; Debtor Notice of Lodgment of Order; Nile Niami Transcript Orders; Reark Notice of Mailed Letter Dkt 223; 224; 225; 226; 227; 228; 229 230; 231; 232; 233;243			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
March 28, 2022	Researching, Developing, Analyzing Debtor Lodgement Notice related To Dkts 226;142; Debtor Response to Rejection of Order granting Debtors Motion for Order related to Dkt 142; Debtor Lodgement Notice; Order on Motion to sell Dkt 244; 245;			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
March 29, 2022	Researching, Developing, Analyzing Order Granting Debtors Motion; Nile Niami Notice of Appeal; 03/21/22 Hearing Transcript; 03/11/22 Hearing Transcript; 12/10/21 Hearing Transcript; 12/02/21 Hearing Transcript Dkt 247; 249; 251; 253; 255; 257			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
March 30, 2022	Researching, Developing, Analyzing Nile Niami Appeal Referral Notice Appearance Notice Kyra Andrassy Inferno Investment Inc. Dkt 259; 260			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
March 31, 2022	Researching, Developing, Analyzing Debtor Motion to Set Last day to File Proof of Claims; 03/18/22 Hearing Transcript; Order on Motion To Sell Dkt 261;263; 264			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
April 01, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
April 04, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
April 05, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
April 06, 2022	Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian/944 Airole LLC Dated March 30, 2022 Remedy and Recourse			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>

## Detailed Activities

Crestlloyd LLC

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April 07, 2022 Researching, Developing, Analyzing Fraudulent Deed to Richard Saghian Dated March 30, 2022 Remedy and Recourse

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
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Total \$81,500.00 163.0

### 04 Case Administration

April 08, 2022 Researching, Developing, Analyzing Order Granting motion to extend Exclusivity Period 270

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$1,000.00</u>	<u>2.0</u>
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April 11, 2022 Researching, Developing, Analyzing Order on Motion to Extend Exclusivity Period Dkt 271

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$1,000.00</u>	<u>2.0</u>
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April 20, 2022 Researching, Developing, Analyzing Debtor Declaration that no party Requested a hearing; Debtors optional Appellate Statement Dkt 284;285

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
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April 21, 2022 Researching, Developing, Analyzing Debtor Sale Closing Statement Dkt 286

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
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May 03, 2022 Researching, Developing, Analyzing Notice of Appearance Karol K. Demiston, Christopher J. Giaimo filed by Pacific Union International dba Compass; other case administration

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
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May 05, 2022 Researching, Developing, Analyzing Debtor Chapter 11 MOR Dkt 302

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
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May 06, 2022 Researching, Developing, Analyzing Debtor Chapter 11 MOR Stipulation with American Truck and Tool Rentals Inc.; Order Approving Stip with Debtor and American Truck Dkt 303; 304; 305

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
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May 16, 2022 Researching, Developing, Analyzing Debtor MFS Dkt 315

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
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## Detailed Activities

**Crestlloyd LLC**

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From Date January 01, 2022

To Date December 31, 2022

May 24, 2022 Researching, Developing, Analyzing Notice of Appearance John Moe II  
For Yogi Securities Holdings LLC; Debtor Chapter 11 MOR; Inferno Investments Notice of Transcript; Lawrence R. Perkins Declaration in Support of LNYG First Interim Fee/Reimbursement application  
Dkt 322; 323; 324

<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>
May 25, 2022	Researching, Developing, Analyzing Motion for Authority to Disburse funds to Hankey Capitol LLC Dkt 325			
<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>
May 26, 2022	Researching, Developing, Analyzing Debtor Application shortening time, Debtor Amended Application Shortening Time, Order Granting Motion Shortening time Dkt 326; 327; 329			
<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>
June 27, 2022	Researching, Developing, Analyzing Debtor Motion to extend Exclusivity period; FRCP/FRBP; Debtor MOR Dkt 371;374			
<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$2,000.00</b>	<b>8.0</b>
June 28, 2022	Researching, Developing, Analyzing Theodore Lanes Stay Stip; Theodore Lanes Lodgement Notice; Dkt 375; 376; 324			
<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>
July 01, 2022	Researching, Developing, Analyzing Order for Automatic Stay; USDC Dismissal of Inferno Appeal Dkt 377; 378			
<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>
July 05, 2022	Researching, Developing, Analyzing Stip and Order; Yogi Substitution Yogi Stip FRCP/FRBP Case Administration Dkt 379;			
<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>
July 11, 2022	Researching, Developing, Analyzing : Yogi Substitution Yogi Stip FRCP/FRBP Case Administration Dkt 380; 381			
<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$2,000.00</b>	<b>8.0</b>
July 20, 2022	Researching, Developing, Analyzing Debtor Chapter 11 MOR Dkt 387			
<u>2004001</u>	SAMesje	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>

## Detailed Activities

**Crestlloyd LLC** November 18, 2024 Page Number 07  
**Case Number 220216001** From Date January 01, 2022  
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July 21, 2022	Researching, Developing, Analyzing Order Granting Second motion to extend exclusivity agreement: USDC Debtor Appeal Dismissal FRCP/FRBP Case Administration Dkt 388; 390
<u>2004001</u>	SAMesje
	500.00
	\$2,000.00
	4.0
	<b>Total \$58,000.00 116.0</b>

### **05 \_ Claims Administration and Objections**

January 03, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
January 04, 2022	Researching and Developing Creditors Objections			

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
January 05, 2022	Researching and Developing Creditors Objections			

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
January 06, 2022	Researching and Developing Creditors Objections			

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
January 07, 2022	Researching and Developing Creditors Objections			

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
January 10, 2022	Researching and Developing Creditors Objections			

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
January 11, 2022	Resarching and Developing Creditors Objections			

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
January 12, 2022	Researching and Developing Creditors Objections			

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
January 13, 2022	Resarching and Developing Creditors Objections			

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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Crestlloyd LLC

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Case Number 220216001

From Date January 01, 2022

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January 14, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 17, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 18, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 19, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 20, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 21, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 24, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 25, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 26, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 27, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 28, 2022 Researching and Developing Creditors Objections

2004001 SAMesje 500.00 \$2,000.00 4.0

January 31, 2022 Researching, Developing and Preparing Creditors Objections

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Crestlloyd LLC		November 18, 2024	Page Number	09
Case Number 220216001		From Date January 01, 2022		
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<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 01, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 02, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 03, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 04, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 07, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 08, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 09, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 10, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 11, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 14, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
February 15, 2022	Researching, Developing and Preparing Creditors Objections			
<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>

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**Case Number 220216001**

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February 16, 2022 Researching, Developing and Filing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
February 28, 2022	Researching, Developing and/or analyzing Creditor Opposition to Roark sale confirmation Dkt 137			
<u>2004001</u>	SAMesje	500.00	\$1,500.00	3.0
March 15, 2022	Researching, Developing, Analyzing Objection to emergency motion approving bid procedures Dkt 169			
<u>2004001</u>	SAMesje	500.00	\$1,500.00	3.0
March 17 2022	Researching, Developing, Analyzing American Truck & Tool Opposition to Dkt 142, J&E Texture Inc Objection to Dkt 142; Yogi Securities Objection to Dkt 142;			
<u>2004001</u>	SAMesje	500.00	\$2,500.00	5.0
March 18, 2022	Researching, Developing, Analyzing Nile Niami Objection to Dkt 142; Inferno Invesment Opposition Dkt 142; Italian Luxury Group et al Opposition Yvonne Niami Opposition Declaration Dkt 196; 198; 201;202			
<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
March 23, 2022	Researching, Developing, Analyzing Debtor Objection to Nile Niami Declaration; Debtor Objection to Declaration of Javier Gonzales; Objection to Yvonne Niami Declaration; Dkt 211; 212; 213; 214			
<u>2004001</u>	SAMesje	500.00	\$3,000.00	6.0
April 11 2022	Researching, Developing, Analyzing Cross Appeal/Statement of Election By Debtor; Referral Notice of Cross Appeal; Deficiency Notice to Appellant; Debtor Amended Cross Appeal Dkt 272; 272;273;274;275			
<u>2004001</u>	SAMesje	500.00	\$4,00.00	8.0
April 12, 2022	Researching, Developing, Analyzing Nile Niami Designation of Contents For Inclusionin Record on Appeal; Statement of Issues on Appeal; Notice of Transcripts; Notice of Transcripts; Inferno Investments, Inc. Notice of Appeal and Statements; Notice of Appeal Inferno Dkt 276;277;278;279			
<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
April 14, 2022	Researching, Developing, Analyzing Roark Notice Dkt 282			
<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0

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Case Number 220216001

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April 15, 2022	Researching, Developing, Analyzing Notice of Referral of Appeal by Inferno Investments Inc; Opening Letter RE: Appeal from BAP; Notice filed by Roark Dkt 280; 281; 283				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,00.00</u>	<u>8.0</u>	
April 22, 2022	Researching, Developing, Analyzing Order granting and Denying in part Motion to establish bar date Dkt 288				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>	
April 23, 2022	Researching, Developing, Analyzing Proof of claim bar date filing; USDC Assignment Notice to Appeal; Debtors MFS Dkt 289;290;291				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
April 24, 2022	Researching, Developing, Analyzing Order on Motion to Set Last day To File Claims Proof				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>	
April 27, 2022	Researching, Developing, Analyzing Debtor and Inferno Designatation of Contents For Inclusion in Record of Appeal Dkt 293; 294				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
April 28, 2022	Researching, Developing, Analyzing Nile Niami Certificate of Readiness of Record on Appeal to District Court and Appeal Briefing Schedule; Debtor Statement of Issues on Appeal and Appellee designation of Countents for Inclusion in Record Dk 295; 296; 297; 298				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
April 29, 2022	Researching, Developing, Analyzing Debtor Statement of Issues on Appeal Debtors Amended Statement; Misc Dkt 299; 300				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
May 08, 2022	Researching, Developing, Analyzing Hearing Notice on LNYBG First Interim Application for Approval of Fees and Reimbursement; Debtor Motion FOR AUTHORITY TO PAY CERTAIN CREDITORS Dkt 307; 308				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
May 09, 2022	Researching, Developing, Analyzing Stipulation and Order; LA County Treasurer and tax collector withdrawal of claim Dk 312; 313; FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
May 13, 2022	Researching, Developing, Analyzing Inferno Investment Inc. Objection to LNYBG First Interin fee & Reimburesemnt Application Dkt 299; 300				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	

## Detailed Activities

<b>Crestlloyd LLC</b>		November 18, 2024	Page Number	12
<b>Case Number 220216001</b>			<b>From Date</b>	<b>January 01, 2022</b>
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May 17, 2022	Researching, Developing, Analyzing Hearing Notice on LNYBG First Interim Application for Approval of Fees and Reimbursement; Debtor Motion FOR AUTHORITY TO PAY CERTAIN CREDITORS Dkt 307; 308			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
May 18, 2022	Researching, Developing, Analyzing Debtor Amended Motion For Authority to Pay Creditors Dkt 319			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
May 19, 2022	Researching, Developing, Analyzing Debtor Reply to Inferno Opposition FRCP/FRBP Dkt 320			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
May 27, 2022	Researching, Developing, Analyzing Inferno Readiness Certificate of Record on Appeal; Pacific Union International dba Compass Address Change Notice; Inferno Completed Record Notice; Debtor Declaration Telephonic Notice of Shortend Notice Hearing; Shortend Notice Hearing Dkt 332; 333; 334			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
May 30, 2022	Researching, Developing, Analyzing Order and Notice of Rescheduled Hearing; Service Proof; Inferno Opposition to Motion to Disburse to Hankey and exhibits; Yogi Objection to Debtor Motion to disburse to Hankey Dkt 335; 336; 337; 338; 339			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
May 31, 2022	Researching, Developing, Analyzing Debtor Reply to Inferno Opposition and Errata; OrderShortening time Dkt 340; 341; 347			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
June 01, 2022	Researching, Developing, Analyzing Debtor Notice of Lodgment of Order to Disburse to Hankey; Order granting LNYBG Fee/Reimbyrement Application; Order granting authority to disburse to hankey Dkt 348; 349 350; 351; 352; 353			
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>

An Ode Mario Smith National Banking Association.

## Detailed Activities

**Crestlloyd LLC**

November 18, 2024 Page Number 13

**Case Number 220216001**

From Date January 01, 2022

To Date December 31, 2022

June 17, 2022 Researching, Developing, Analyzing Inferno Readiness Certificate of Record on Appeal; Pacific Union International dba Compass Address Change Notice; Inferno Completed Record Notice; Debtor Declaration Telephonic Notice of Shortend Notice Hearing; Shortend Notice Hearing Dkt 332; 333; 334

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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June 23, 2022 Researching, Developing, Analyzing Case; FRCP/FRBP; Case Law

<u>2004001</u>	SAMesje	500.00	\$4,000.00	6.0
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June 24, 2022 Researching, Developing, Analyzing Electronic Filing Notice; Debtor Objection to Showroom Interiors LLC Disbursement Motion; Miles Staglik Declaration; Debtor Evidentiary Objections; Motion to Extend Exclusivity Period Dkt 366; 367; 368; 369; 371

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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July 12, 2022 Researching, Developing, Analyzing Case; FRCP/FRBP; Case Law

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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July 13, 2022 Researching, Developing, Analyzing Case; FRCP/FRBP; Case Law

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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July 14, 2022 Researching, Developing, Analyzing Case; FRCP/FRBP; Case Law

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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July 15, 2022 Researching, Developing, Analyzing Case; FRCP/FRBP; Case Law

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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July 18, 2022 Researching, Developing, Analyzing Showroom Interiors Reply and Objection to Miles Staglik; Yogi Attorney Substitution; Errata Dkt 383; 384; 385; 386

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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## Detailed Activities

Crestlloyd LLC

November 18, 2024 Page Number 14

Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

June 19, 2022 Researching, Developing, Analyzing Case; FRCP/FRBP; Case Law

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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Total \$190,000.00 380.0

### 98 \_ Fee/ Employment Objections

May 07, 2022 Researching, Developing, Analyzing LNYG Notice of Hearing on First Interim Application of LNYG for approval of fees and Reimbursement filed by Debtor Dkt 306

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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May 08, 2022 Researching, Developing, Analyzing Hearing Notice on Dkt 299; 300

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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May 23, 2022 Researching, Developing, Analyzing Proof of claim bar date filing: USDC Assignment Notice to Appeal; Debtors MFS Dkt 289;290;291

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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Total \$12,000.00 24.0

### 20 \_ Other Litigation

January 03, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 04, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 05, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 06, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 07, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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### Detailed Activities

Crestlloyd LLC

November 18, 2024 Page Number 15

Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

January 10, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 11, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 12, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 13, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 14, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 17, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 18, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 19, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 20, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 21, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 24, 2022 Researching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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January 25, 2022 Resarching and Developing Creditors Objections

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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## Detailed Activities

**Crestlloyd LLC**

November 18, 2024 Page Number 16

**Case Number 220216001**

From Date January 01, 2022

To Date December 31, 2022

January 26, 2022 Researching and Developing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

January 27, 2022 Resarching and Developing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

January 28, 2022 Researching and Developing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

January 31, 2022 Researching, Developing and Preparing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

February 01, 2022 Researching, Developing and Preparing Creditors Objections.

**2004001 SAMesje 500.00 \$2,000.00 4.0**

February 02, 2022 Researching, Developing and Preparing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

February 03, 2022 Researching, Developing and Preparing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

February 04, 2022 Researching, Developing and Preparing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

February 07, 2022 Researching, Developing and Preparing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

February 08, 2022 Researching, Developing and Preparing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

February 09, 2022 Researching, Developing and Preparing Creditors Objections

**2004001 SAMesje 500.00 \$2,000.00 4.0**

February 10, 2022 Researching, Developing and Preparing Creditors Objections

## Detailed Activities

**Crestlloyd LLC**

November 18, 2024 Page Number 17

**Case Number 220216001**

From Date January 01, 2022

To Date December 31, 2022

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
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February 11, 2022 Researching, Developing and Preparing Creditors Objections

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>2,000.00</u>	<u>4.0</u>
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February 14, 2022 Researching, Developing and Preparing Creditors Objections

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
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February 15, 2022 Researching, Developing and Preparing Creditors Objections

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
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February 16, 2022 Researching, Developing and Filing Creditors Objections

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
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February 17, 2022 Researching, Developing, Preparing Emergency Protective Order/Seal

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
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February 18, 2022 Researching, Developing, Preparing Emergency Protective Order/Seal

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
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February 21, 2022 Researching, Developing, Preparing Emergency Protective Order/Seal

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
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February 22, 2022 Researching, Developing, Preparing Emergency Protective Order/Seal

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$3,000.00</u>	<u>6.0</u>
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February 23, 2022 Researching, Developing, Preparing Emergency Protective Order/Seal

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>
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February 24, 2022 Researching, Developing, filing Emergency Protective Order  
Dkt 132

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>
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February 25, 2022 Researching, Developing and Analyzing Opposition to Roark Motion  
Filed by Debtor Counsel Dkt 134

<u>2004001</u>	SAMesje	<u>500.00</u>	<u>\$2,500.00</u>	<u>5.0</u>
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## Detailed Activities

Crestlloyd LLC

November 18, 2024 Page Number 18

Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

February 28, 2022 Researching, Developing, Preparing, Serving Creditor Opposition, to Roark Motion for Order for Confirmation of Sale Dkt 137

2004001 SAMesje 500.00 \$3,000.00 6.0

March 01, 2022 Researching, Developing, Preparing Creditor Second Motion for Seal

2004001 SAMesje 500.00 \$4,000.00 8.0

March 02, 2022 Researching, Developing, Preparing Creditor Second Motion for Seal and Creditors Full Settlement and Closure Motion

2004001 SAMesje 500.00 \$2,000.00 4.0

March 03, 2022 Researching, Developing, Preparing Creditor Second Motion for Seal and Creditors Full Settlement and Closure Motion

2004001 SAMesje 500.00 \$4,000.00 8.0

March 04, 2022 Researching, Developing, Preparing Creditor Second Motion for Seal and Creditors Full Settlement and Closure Motion

2004001 SAMesje 500.00 \$4,000.00 8.0

March 07, 2022 Researching, Developing, filing Creditor Second Motion for Seal and Creditors Full Settlement and Closure Motion

2004001 SAMesje 500.00 \$4,000.00 8.0

March 08, 2022 Researching, Developing, Preparing Opposition to Buyers Emergency Motion to Enforce Order approving bid procedure, and Good Faith Winning overBid

2004001 SAMesje 500.00 \$4,000.00 8.0

March 09, 2022 Researching, Developing, Preparing Opposition to Buyers Emergency Motion to Enforce Order approving bid procedure and Winning Good faith Over Bid

2004001 SAMesje 500.00 \$4,000.00 8.0

March 10, 2022 Researching, Developing, filing Opposition to Buyers Emergency Motion to Enforce Order approving bid procedure & appearance notice and Winning Good Faith Over Bid

2004001 SAMesje 500.00 \$2,000.00 8.0

March 11, 2022 Hearing Dept 1639

2004001 SAMesje 500.00 \$1,000.00 2.0

March 18, 2022 Hearing Dept 1639

2004001 SAMesje 500.00 \$1,000.00 2.0

## Detailed Activities

Crestlloyd LLC

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Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

March 21, 2022 Hearing Dept 1639

<u>2004001</u>	SAMesje	500.00	\$1,000.00	2.0
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March 24, 2022 Hearing Dept 1639

<u>2004001</u>	SAMesje	500.00	\$1,000.00	2.0
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April 01, 2022 Researching and Developing Creditors Objections, Recording

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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April 04, 2022 Researching and Developing Creditor Objections Recording

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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April 08, 2022 Researching, Developing, Analyzing FRCP/FRBP

<u>2004001</u>	SAMesje	500.00	\$3,000.00	6.0
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April 11, 2022 Researching, Developing, Analyzing

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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April 12, 2022 Researching, Developing, Analyzing

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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April 13, 2022 Researching, Developing, Analyzing Frep/FRBP LA Recorder Office

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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April 18, 2022 Researching, Developing, Analyzing, Preparing LA Recorder Docs  
Liens, FRCP/FRBP, Requesting Certified copies, Misc

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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April 19, 2022 Researching, Developing, Analyzing Remedies and Recourse, FRCP/-  
FRBP, Touring Lands, Enforcing Cease and Desist Notices

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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April 21, 2022 Researching, Developing, Analyzing Inferno Investments Appeal  
Transferred notice; Misc Dkt 287

<u>2004001</u>	SAMesje	500.00	\$2,000.00	4.0
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**Crestlloyd LLC**

November 18, 2024 Page Number 20

**Case Number 220216001**

From Date January 01, 2022

To Date December 31, 2022

April 22, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$2,000.00</b>	<b>4.0</b>	
April 24, 2022	Researching, Developing, Anal LA Recorder yzing case, filing, book/record keeping Administrative/clerical dutes				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$2,000.00</b>	<b>4.0</b>	
April 25, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>	
May 02, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>	
May 03, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$2,000.00</b>	<b>4.0</b>	
May 04, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>	
May 10, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>	
May 11, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>	
May 12, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>	
May 17, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder Dkt 317; 318				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>	
May 20, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes LA Recorder				
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>	<b>8.0</b>	
May 23, 2022	Researching, Developing, Analyzing case, filing, book/record keeping				

## Detailed Activities

Crestlloyd LLC

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Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

Administrative/clerical dutes LA Recorder

2004001 SAMesje 500.00 \$4,000.00 8.0

May 26, 2022 Hearing Department 1639

2004001 SAMesje 500.00 \$1,000.00 2.0

June 02, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP?FRBP

2004001 SAMesje 500.00 \$4,000.00 8.0

June 03, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP?FRBP

2004001 SAMesje 500.00 \$4,000.00 8.0

June 02, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP/FRBP

2004001 SAMesje 500.00 \$4,000.00 8.0

June 03, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP?FRBP

2004001 SAMesje 500.00 \$4,000.00 8.0

June 06, 2022 Researching, Developing, Analyzing Order for authority to pay creditors;  
Supplemental Brief; Showroom Interiors LLC Motion Requesting Payment  
Dkt 354; 355; 356; 357 358

2004001 SAMesje 500.00 \$4,000.00 8.0

June 07, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP?FRBP

2004001 SAMesje 500.00 \$4,000.00 8.0

June 08, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP?FRBP

2004001 SAMesje 500.00 \$4,000.00 8.0

June 09, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP?FRBP

2004001 SAMesje 500.00 \$4,000.00 8.0

June 10, 2022 Researching, Developing, Analyzing Yogi Objection to Authority to  
Disburse to Hankey Dkt 359

2004001 SAMesje 500.00 \$4,000.00 8.0

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Crestlloyd LLC

November 18, 2024 Page Number 22

Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

June 13, 2022	Researching, Developing, Analyzing Inferno Adversarial Complaint Dkt 360				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
June 14, 2022	Researching, Developing, Analyzing Inferno Oppostion to Motion for Authority to Disburse to Hankey Dkt 361				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
June 15, 2022	Researching, Developing, Analyzing Debtor Reply to Inferno Opposition Debtor MFS Dkt 364: 365				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
June 23, 2022	Hearing Dept 1639				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$1,000.00</u>	<u>2.0</u>	
June 10, 2022	Researching, Developing, Analyzing Yogi Objection to Authority to Disburse to Hankey Dkt 359				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
June 13, 2022	Researching, Developing, Analyzing Inferno Adversarial Complaint				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
July 21, 2022	Hearing in Dept 1639				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>	
July 22, 2022	Researching, Developing, Analyzing Inferno Adversarial Complaint				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
July 25, 2022	Resarching, Developing Analyzing Order on Motion to Extend Exclusivity Debtor MOR Researching, Developing, Analyzing Inferno Adversarial Complaint				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
July 26, 2022	Researching, Developing, Analyzing Yogi Objection to Authority to Disburse to Hankey Dkt 359				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
July 27, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	

## Detailed Activities

Crestlloyd LLC

November 18, 2024 Page Number 23

Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

July 28, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$2,000.00</u>	<u>4.0</u>	
July 29, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 13, 2022	Researching, Developing, Analyzing Motion For Contempt of Buyers Motion Andre Mario Smith to Show Cause Dkt 395				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 14, 2022	Researching, Developing, Analyzing Genevieve Declaration; Lodgment For Contempt Motion; Richard Saghian shortening time application and lodgment Dkt 396; 397; 398; 399				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 15, 2022	Researching, Developing, Analyzing preparing filing Demurrer/- Objection and motion to seal exhibits				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 16, 2022	Researching, Developing, Analyzing case, Contempt remedies/strategies FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 17, 2022	Researching, Developing, Analyzing case, Contempt remedies/strategies FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 18, 2022	Researching, Developing, Analyzing case, Contempt remedies/strategies FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 19, 2022	Researching, Developing, Analyzing case, Contempt remedies/strategies FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 22, 2022	Researching, Developing, Analyzing case, Contempt remedies/strategies FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	
August 23, 2022	Researching, Developing, Analyzing case, Contempt remedies/strategies FRCP/FRBP				
<u>2004001</u>	<u>SAMesje</u>	<u>500.00</u>	<u>\$4,000.00</u>	<u>8.0</u>	

## Detailed Activities

**Crestlloyd LLC**

November 18, 2024 Page Number 24

**Case Number 220216001**

From Date January 01, 2022

To Date December 31, 2022

August 24, 2022 Researching, Developing, Analyzing Debtor MFS Contempt remedies/-strategies FRCP/FRBP

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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August 25, 2022 Researching, Developing, Analyzing case, Contempt remedies/strategies FRCP/FRBP Dkt 404; 405; 406

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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August 26, 2022 Researching, Developing, Analyzing Order on Seal Exhibits: FRCP/FRBP

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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August 29, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP; Adversarial Proceedings

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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August 30, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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August 31, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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September 01, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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September 02, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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September 05, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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September 06, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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September 07, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

<u>2004001</u>	SAMesje	500.00	\$4,000.00	8.0
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September 08, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

## Detailed Activities

Crestlloyd LLC

November 18, 2024 Page Number 25

Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

2004001	SAMesje	500.00	\$4,000.00	8.0
September 09, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 12, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 13, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 14, 2022	Researching, Developing, Analyzing Debtor MOR; Debtor Stip; Exhibit A to Stip; book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings Dkt 408; 409; 410			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 15, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 16, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 19, 2022	Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 20, 2022	Researching, Developing, Analyzing Buyer and Debtor Joint Motion Richard Saghian Declaration book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings Dkt 411; 412			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 21, 2022	Researching, Developing, Analyzing, book/- record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings			
2004001	SAMesje	500.00	\$4,000.00	8.0
September 22, 2022	Researching, Developing, Analyzing Order aproving Stip book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings Dkt 413			
2004001	SAMesje	500.00	\$4,000.00	8.0

## Detailed Activities

**Crestlloyd LLC**

**November 18, 2024 Page Number 26**

**Case Number 220216001**

**From Date January 01, 2022**

**To Date December 31, 2022**

September 23, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

September 26, 2022 Researching, Developing, Analyzing Removal Request; Stip Order book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings Dkt 415; 416

**2004001 SAMesje 500.00 \$4,000.00 8.0**

September 27, 2022 Researching, Developing, Analyzing Debtor Chapter 11 MOR & MFS Dkt 417; 418

**2004001 SAMesje 500.00 \$4,000.00 8.0**

September 28, 2022 Researching, Developing, Analyzing Order Denying Andre Mario Smith Contempt/Show Cause; Service Certificate book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

September 29, 2022 Researching, Developing, Analyzing and Preparing Objection to Joint Motion and attachments

**2004001 SAMesje 500.00 \$4,000.00 8.0**

September 30, 2022 Researching, Developing, Analyzing Order on Contempt Motion filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 03, 2022 Researching, Developing, Analyzing inferno Stip, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings Dkt 428

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 04, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 05, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Admininistrative/clerical dutes FRCP/FRBP Adversarial Proceeedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 06, 2022 Researching, Developing, Analyzing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceeedings Dkt 429

**2004001 SAMesje 500.00 \$4,000.00 8.0**

## Detailed Activities

Crestlloyd LLC

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Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

October 07, 2022 Researching, Developing, Analyzing Roark Ex Parte Motion book/record  
Keeping Administrative/clerical dutes FRCP/FRBP Adversarial  
Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 10, 2022 Researching, Developing, Analyzing Debtor Opposition to Roark Ex Parte  
book/record keeping Administrative/clerical dutes FRCP/FRBP; Preparing  
Request for Extention Adversarial Proceedings Dkt 430

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 11, 2022 Researching, Devcloping, Analyzing case, filing Request for Extention,  
book/record keeping Administrative/clerical dutes FRCP/FRBP  
Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 12, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 13, 2022 Researching, Developing, Analyzing Extension Order; book/record  
Keeping Administrative/clerical dutes FRCP/FRBP Adversarial  
Proceedings Dkt 424

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 14, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 17, 2022 Researching, Developing, Analyzing Debtor Opposition to Roark Ex Parte  
book/record keeping Administrative/clerical dutes FRCP/FRBP; Preparing  
Request for Extention Adversarial Proceedings Dkt 430

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 18, 2022 Researching, Developing, Analyzing Request for Extention,  
book/record keeping Administrative/clerical dutes FRCP/FRBP  
Adversarial Proceedings Dkt 432; 433

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 19, 2022 Researching, Developing, Analyzing Order on Motion to Extend time  
book/record keeping Administrative/clerical dutes FRCP/FRBP  
Adversarial Proceedings Dkt 435

**2004001 SAMesje 500.00 \$4,000.00 8.0**

## Detailed Activities

**Crestlloyd LLC**

November 18, 2024 Page Number 28

**Case Number 220216001**

From Date January 01, 2022

To Date December 31, 2022

October 20, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 21, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 24, 2022 Researching, Developing, Analyzing Debtor MFS book/record keeping  
Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings  
Dkt 436

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 25, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 26, 2022 Researching, Developing, Analyzing Debtor MOR book/record keeping  
Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 27, 2022 Researching, Developing, Analyzing case, filing, book/record keeping  
Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 28, 2022 Researching, Developing, Analyzing and preparing Application for Cost  
taxation, book/record keeping Administrative/clerical dutes FRCP/-  
FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

October 31, 2022 Researching, Developing, Analyzing and preparing Application for Cost  
taxation, book/record keeping Administrative/clerical dutes FRCP/-  
FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 01, 2022 Researching, Developing, Analyzing and preparing Application for Cost  
taxation, book/record keeping Administrative/clerical dutes FRCP/-  
FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 02, 2022 Researching, Developing, Analyzing and preparing Application for Cost  
taxation, book/record keeping Administrative/clerical dutes FRCP/-  
FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

## Detailed Activities

**Crestlloyd LLC**

November 18, 2024 Page Number 29

**Case Number 220216001**

From Date January 01, 2022

To Date December 31, 2022

November 03, 2022 Researching, Developing, Analyzing and preparing Application for Cost taxation, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 04, 2022 Researching, Developing, Analyzing and preparing Application for Cost taxation, book/record keeping Administrative/clerical dutes FRCP/- FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 07, 2022 Researching, Developing, Analyzing and preparing Application for Cost taxation, book/record keeping Administrative/clerical dutes FRCP/- FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 08, 2022 Researching, Developing, Analyzing and preparing Application for Cost taxation, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 09, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 10, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 11, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 14, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

## Detailed Activities

<b>Crestlloyd LLC</b>	<b>November 18, 2024</b>	<b>Page Number</b>	<b>30</b>
<b>Case Number 220216001</b>	<b>From Date</b>	<b>January 01, 2022</b>	
	<b>To Date</b>	<b>December 31, 2022</b>	
November 15, 2022	Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical duties FRCP FRBP Adversarial Proceedings		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>
November 16, 2022	Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical duties FRCP FRBP Adversarial Proceedings		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>
November 17, 2022	Researching, Developing, Analyzing UST Stip; UST Stip lodgment book/record keeping Administrative/clerical duties FRCP/- FRBP Adversarial Proceedings Dkt 442; 443		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>
November 18, 2022	Researching, Developing, Analyzing Order Approving Stip, filing, book/record keeping Administrative/clerical duties FRCP FRBP Adversarial Proceedings Dkt 444		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>
November 21, 2022	Researching, Developing, Analyzing Preparing Second Acceptance for acceptance and full settlement and closure		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>
November 22, 2022	Researching, Developing, Analyzing Preparing filing Second Acceptance For acceptance and full scitelment and closure		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>
November 23, 2022	Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical duties FRCP FRBP Adversarial Proceedings		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>
November 24, 2022	Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical duties FRCP FRBP Adversarial Proceedings		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>
November 25, 2022	Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical duties FRCP/FRBP Adversarial Proceedings		
<b>2004001</b>	<b>SAMesje</b>	<b>500.00</b>	<b>\$4,000.00</b>
			<b>8.0</b>

## Detailed Activities

**Crestlloyd LLC**

November 18, 2024 Page Number 31

**Case Number 220216001**

**From Date January 01, 2022**

**To Date December 31, 2022**

November 28, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 29, 2022 Researching, Developing, Analyzing UST Stip 2<sup>nd</sup> Interim Application And lodgment, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

November 30, 2022 Researching, Developing, Analyzing Debtor Opposition Andre Mario Smith full settlement and closure, Order approving UST Stip book/-record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings Dkt 450; 451

**2004001 SAMesje 500.00 \$4,000.00 8.0**

December 01, 2022 Researching, Developing, Analyzing Debtor MFS case, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings Dkt 452

**2004001 SAMesje 500.00 \$4,000.00 8.0**

December 02, 2022 Researching, Developing, Analyzing Reservation of Rights Statement, filing, book/record keeping Administrative/clerical dutes FRCP/FRBP Adversarial Proceedings; Stip Order Dkt 453; 455

**2004001 SAMesje 500.00 \$4,000.00 8.0**

December 05, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

December 06, 2022 Researching, Developing, Analyzing Richard Saghian Opposition to Acceptance Full Settlement and Closure book/record keeping Dkt 456 Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

December 07, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

**2004001 SAMesje 500.00 \$4,000.00 8.0**

## Detailed Activities

Crestlloyd LLC

November 18, 2024 Page Number 32

Case Number 220216001

From Date January 01, 2022

To Date December 31, 2022

December 08, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proccedings

2004001 SAMesje 500.00 \$4,000.00 8.0

December 09, 2022 Researching, Developing, Analyzing Debtor MOR Hearing Dept 1639 filing, Book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings Dkt 458

2004001 SAMesje 500.00 \$4,000.00 8.0

December 12, 2022 Researching, Developing, Analyzing Order on Compensation, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings Dkt 460

2004001 SAMesje 500.00 \$4,000.00 8.0

December 13, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

2004001 SAMesje 500.00 \$4,000.00 8.0

December 14, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Admininistrative/clerical dutes FRCP FRBP Adversarial Proceedings

2004001 SAMesje 500.00 \$4,000.00 8.0

December 15, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Administrative/clerical dutes FRCP FRBP Adversarial Proceedings

2004001 SAMesje 500.00 \$4,000.00 8.0

December 16, 2022 Researching, Developing, Analyzing and preparing case, filing, book/record keeping Admininistrative/clerical dutes FRCP FRBP Adversarial Proceedings

2004001 SAMesje 500.00 \$4,000.00 8.0

Total \$654,500.00 1,309.0

## Individual Activities

November 19, 2024 Page 1

Crestlloyd LLC

Case Number 220216001

Services Rendered From January 01, 2022 Through December 31, 2022

### 01 – Asset Analysis and Recovery

SAM	28.0	500.00	\$14,000.00
Total Hours	28.0	Total Fees	\$14,000.00

## Individual Activities

November 19, 2024 Page 2

Crestlloyd LLC

Case Number 220216001

Services Rendered From January 01, 2022 Through December 31, 2022

### 02 – Asset Disposition

SAM	163.0	500.00	\$81,500.00
Total Hours	163.0	Total Fees	\$81,500.00

## Individual Activities

November 19, 2024 Page 3

Crestlloyd LLC

Case Number 220216001

Services Rendered From January 01, 2022 Through December 31, 2022

### 04 – Case Administration

SAM	166.0	500.00	\$58,500.00
Total Hours	<hr/> 166.0	Total Fees	<hr/> \$58,500.00

*Anne Marie Smith National Banking Association.*

## Individual Activities

November 19, 2024 Page 4

Crestlloyd LLC

Case Number 220216001

Services Rendered From January 01, 2022 Through December 31, 2022

### 05 – Claims Administration and Objections

SAM	380.0	500.00	\$190,000.00
Total Hours	380.0	Total Fees	\$190,000.00

## Individual Activities

November 19, 2024 Page 5

Crestlloyd LLC

Case Number 220216001

Services Rendered From January 01, 2022 Through December 31, 2022

### 08 – Fee/Employment Objections

SAM	24.0	500.00	\$12,000.00
Total Hours	<hr/> 24.0	Total Fees	<hr/> \$12,000.00

## Individual Activities

November 19, 2024 Page 6

Crestlloyd LLC

Case Number 220216001

Services Rendered From January 01, 2022 Through December 31, 2022

### 20 – Other Litigation

SAM	1,309.001	500.00	\$654,500.00
Total Hours	<hr/> 1,309.001	Total Fees	<hr/> \$654,500.00

## Professional Activity Summary

November 19, 2024

Crestlloyd LLC

Case Number 220216001

From January 01, 2022  
To December 31, 2022

Smith, Andre Mario	2,020.001	Hours at \$500	\$1,010,270.98
Total Hours	2,020.001	Total Fees	\$1,010,270.98

Andre Mario Smith national banking association.

## Activity Summary

November 19, 2024

Crestlloyd LLC

Case Number 220216001

From January 01, 2022  
To December 31, 2022

<u>Description</u>	<u>Fees</u>
Asset Analysis and Recovery	\$14,000.00
Asset Disposition	\$81,500.00
Case Administration	\$58,000.00
Claims Administration and Objections	\$190,000.00
Fee / Employment	\$12,000.00
Other Litigation	\$654,500.00
Total Fees	\$1,010,270.98

Andre Mario Smith National Consulting Association.

1 **NEF SERVICE LIST:**

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3 • Todd M Arnold tma@lnbyg.com  
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5 • Ryan Coy ryan.coy@saul.com, hannah.richmond@saul.com  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

*4245 5 street, San Diego, California 92102*

A true and correct copy of the foregoing document entitled (specify): *Second Interim Application by Smith, Andre Mario et Sui Juris, re:iture for approval of fees, and Reimbursement of expenses; Declaration by Smith, Andre Mario et Sui Juris, in Support Thereof.*

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) *November 25, 2024* I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date) *November 25, 2024* I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

*November 25, 2024* *Donald Gregory*  
Date Printed Name

*07024*  
*Signature* *Donald Gregory*

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 2818 La Cienega Avenue, Los Angeles, CA 90034.

A true and correct copy of the foregoing document entitled **Motion To Deny “Second Interim Application Of Smith, Andre Mario El Sui Juris; Esquire For Approval Of Fees And Reimbursement At Expenses”** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **December 4, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **December 4, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Andre Mario Smith el sui-juris, esquire  
7938 Broadway No. 1263  
Lemon Grove, CA 91946  
*Counsel for Special Interested Party*

Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **December 4, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

### VIA EMAIL

Andre Mario Smith el sui-juris, esquire: [andmarioith@yahoo.com](mailto:andmarioith@yahoo.com)

Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

December 4, 2024

Rebecka Merritt

/s/ Rebecka Merritt

Date

Type Name

Signature

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